

JUSTIN C. BONUS, ESQ.
ATTORNEY AT LAW

JUSTIN C. BONUS, ESQ.
JUSTIN.BONUS@GMAIL.COM

118-35 QUEENS BOULEVARD, SUITE 400
FOREST HILLS, NY 11375

TEL. (347) 920-0160
FAX: (888) 237-8686

November 8, 2019

Hon. John G. Koeltl
United States District Judge
Daniel Patrick Moynihan
United States Courthouse – Room 14A
500 Pearl St.
New York, NY 10007-1312

Via: ECF & Fax

Re: 1:18-cr-00662-JGK USA v. Jones
Subj.: Extension Request to File Rule 29 and Rule 33 post-verdict motions

Dear Honorable Koeltl:

This office represents Michael Jones in the above-captioned matter. I write the Court to request an extension of the deadline to file a motion for judgment of acquittal pursuant to Rule 29 and motion for a new trial pursuant to Rule 33.

Mr. Jones was convicted of Count 1 and acquitted of the statutory enhancement on October 28, 2019. Pursuant to Rule 29 and Rule 33, Mr. Jones' motion for judgment of acquittal and motion for new trial is due to be filed on November 11, 2019. Based upon the complexity of Mr. Jones' motion and my other obligations, I am requesting a 14-day extension to file his post-verdict motions.

We appreciate the Court's consideration to our request.

Sincerely,

JUSTIN BONUS, ESQ.

/s/Justin Bonus

Justin Bonus, Esq.

Via ECF
Thane Rehn
Assistant United States Attorney
United States Attorney's Office
Southern District of New York

*Time to file post-verdict motions
pursuant to Rules 29 and 33 of the
Federal Rules of Criminal Procedure
is extended to November 25, 2019.*

*so ordered
J. G. Koeltl
11/8/19 U.S.D.J.*

One Saint Andrew's Plaza
New York, New York 10007
T: 212.637.2354 | F: 212.637.2527
nathan.rehn@usdoj.gov